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June 14, 2021

VIA ECF

MEMORANDUM ENDORSEMENT

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Czarnecki v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-06897-ER-GWG

Dear Judge Gorenstein,

We write on behalf of plaintiff, Laura Ann Czarnecki, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on June 18, 2021. Plaintiff respectfully requests an extension of time up to and including August 17, 2021. This is plaintiff's first request for an extension.

The additional time is necessary because our office has numerous closely scheduled (and overlapping) deadlines in social security matters. For the last several months we have received countless requests from the Agency for additional time to serve administrative records because of the delays the Agency is encountering in getting records prepared. We believe that the Agency is now slowly emerging from this backlog, but it is having the unintended effect of creating a backlog on our end.

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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **August 17, 2021**;
- b. Defendant to serve its response/cross-motion on or before **October 16, 2021**; and
- c. Plaintiff to serve her reply (if any) on or before **November 6, 2021**.

Thank you for your consideration of this request.


Respectfully submitted,

s/Daniel A. Osborn
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cc: Amanda Parsels, Esq. (by ECF)

The proposed schedule is approved. No further extensions for either party will be granted absent extraordinary circumstances.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
June 14 2021